

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GETTY IMAGES (US), INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-135 (GBW)
)	
STABILITY AI, LTD. and STABILITY AI,)	
INC.,)	
)	
Defendants.)	

[PROPOSED] ORDER GRANTING PLAINTIFF’S DISCOVERY MOTION

WHEREAS, on May 2, 2023, Defendants Stability AI, Ltd. and Stability AI, Inc. (“Defendants”) filed a Motion to Dismiss or Transfer this Action (D.I. 16, the “Motion”) arguing, *inter alia*, a lack of personal jurisdiction over Defendant Stability AI, Ltd.;

WHEREAS, on May 12, 2023, Plaintiff Getty Images (US), Inc.’s (“Plaintiff,” and collectively with Defendants, the “Parties”) served Jurisdictional Interrogatories and Jurisdictional Requests for the Production of Documents on each of the Defendants (D.I. 20);

WHEREAS, the parties thereafter presented certain disputes regarding jurisdictional discovery to the Court;

WHEREAS, on September 22, 2023, the Court entered an Oral Order granting Plaintiff’s request for jurisdictional discovery and ordering the parties to “meet and confer and attempt to reach agreement on a reasonable and limited scope and schedule for jurisdictional discovery of Stability AI, LLC and Stability AI, Ltd for purposes of Plaintiff’s alter-ego theory,” and further ordering that “[i]f the parties are unable to reach agreement on the reasonable and limited scope and/or schedule for the jurisdictional discovery” they make seek further assistance of the Court; and

WHEREAS, on October 9, 2023, Plaintiff invoked the process set forth in the September

22, 2023 Oral Order for the Court's assistance resolving additional disputes.

NOW, THEREFORE, the Court, having reviewed the papers submitted by the Parties, GRANTS Plaintiff's discovery motion:

Defendant is hereby **COMPELLED** to:

(1) Produce copies of pitch materials shared with any third parties and the e-mail or other correspondence with potential or actual investors concerning transmittals of such materials, no later than seven (7) days from the date of this Order;

(2) Identify the individuals involved in raising capital for Stability AI, Inc. and provide a brief description of their role, in response to Plaintiff's related interrogatory, no later than seven (7) days from the date of this Order; and

(3) Produce final copies of shareholder and board meeting agendas and presentations, no later than seven (7) days from the date of this Order.

SO ORDERED this _____ day of _____, 2023.

Gregory B. Williams
United States District Judge